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IMMUNOLOGISTS

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December 20, 2002

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, D.C. 20590-0001

Re: Docket No. FFA-2002-13378 - 3266

Dear Sir/Madam:

The American Association of Immunologists (AAI) wishes to comment on the Department of Transportation's (DOT) proposed rule relating to "Reports by Carriers on Incidents Involving Animals During Air Transport". While we realize that the apparent intent of the proposed rule is to promote the safety of household pets during air transport, we are concerned that the proposed rule is overly broad and may inadvertently impede scientific research.

AAI is a professional association of more than 6,000 research scientists and physicians dedicated to understanding the immune system, with the goal of developing innovative approaches to prevent, treat, and cure disease. Our members are working on some of the most critically important and promising areas of biomedical research that are at the core of immunologic science, including:

- developing effective vaccines, including for HIV/AIDS, influenza, and agents of bioterrorism;
- discovering new defenses against re-emerging tuberculosis and drug-resistant bacteria;
- regulating autoimmune diseases such as diabetes, myasthenia gravis, and lupus;
- discovering the causes of cancer and promising new treatments; and
- developing treatments to prevent the rejection of transplanted organs and bone marrow.

Research in immunology frequently requires the use of animals, and in particular, rats and mice. While we support and practice the humane treatment of these animals that are so essential to our work, we are concerned about laws or regulations which could impede

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Letter to Docket Management System from AAI
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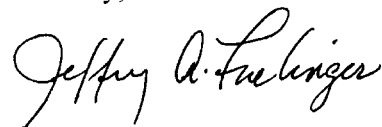
scientists' ability to transport research animals or deter air carriers from being willing to transport such animals.

In particular, we are concerned that the DOT's proposed rule includes a definition of "animal" that is overly broad and could be interpreted to extend beyond family pets to animals used in biomedical research. In addition, we are concerned that the proposed rule's use of the term "injury....of an animal during air transport" could expose air carriers to liability as a result of circumstances, and for a period of time, for which they should not be held responsible. Finally, "injury" should be defined and limited to "physical" injury.

We strongly support the position of the American College of Laboratory Animal Medicine (ACLAM), and recommend to you their comments of December 20, 2002.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in cursive script, reading "Jeffrey A. Frelinger".

Jeffrey A. Frelinger, Ph.D.
Chair, Committee on Public Affairs